

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
WESTERN DIVISION**

DREWES FARMS PARTNERSHIP,)	Case No. 3:19-cv-00434-JZ
)	
Plaintiff,)	Hon. Jack Zouhary
)	
v.)	
)	
CITY OF TOLEDO, OHIO,)	
)	
Defendant.)	

**DEFENDANT CITY OF TOLEDO’S RESPONSE TO
OHIO ATTORNEY GENERAL DAVE YOST’S
MOTION TO INTERVENE**

Now comes the Defendant, City of Toledo (“City”), by and through counsel, and submits its response to the Motion to Intervene filed by proposed Intervenor-Plaintiff Ohio Attorney General Dave Yost (Doc. #13). Although the City takes issue with several of the unfounded statements and mischaracterizations in that Motion, the City does not oppose Ohio Attorney General Dave Yost’s Motion to Intervene. The City of Toledo has a significant interest in the protection of Lake Erie and the resources the Lake Erie watershed provide to the City of Toledo and its residents, in addition to its significant and fundamental interest in protecting its rights to local self-government. The City reserves its right to challenge, correct, or address any arguments, allegations, or statements made by the proposed Intervenor-Plaintiff at a later time.

Respectfully submitted,

s/ Gerald R. Kowalski
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CERTIFICATE OF SERVICE

This is to certify that a copy of the foregoing has been electronically filed this 12th day of April, 2019. Notice of this filing will be sent by operation of the Court's electronic filing system to all parties indicated on the electronic filing receipt. Parties may access this filing through the Court's system.

s/ Gerald R. Kowalski
Gerald R. Kowalski